

STEPHEN S. DOBSON, III

A Professional Association

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January 2, 2003

VIA HAND DELIVERY

Mr. Herbert W. A. Thiele
County Attorney
Board of County Commissioners
301 South Monroe Street
Tallahassee, Florida 32301

Re: *State of Florida v. Rudy Maloy*

Dear Mr. Thiele:

Please find attached a letter from Commissioner Rudy Maloy requesting reimbursement of the legal fees and costs incurred as a result of defending Mr. Maloy in *State of Florida v. Rudy Maloy*, Case No. R2001-2042, and *State of Florida v. Maloy*, 1st DCA Case No. 1D02-1200, as well as *State of Florida v. Rudy Maloy*, Case No. 2002-9373. This is being submitted pursuant to the Leon County Board of County Commissioners' policy number 93-50, which provides for reimbursement of attorneys fees and costs for successfully defending legal actions brought against county commissioners. It is my understanding that this policy states that the decision for payment "shall be delegated to the County Attorney." I believe Mr. Maloy has met all the requirements listed in Section 4 of this policy in his letter which is attached.

Our billing statement comports with the eight criteria set out in the Florida Bar Rule 4-1.5(b) which governs the determination of a "reasonable fee" by members of the Florida Bar. These rules are set out as follows:

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- (1) the time and labor required, the novelty, complexity, and difficulty of the questions involved, and the skill requisite to perform the legal service properly;**

This case involved complicated and novel issues of law which consumed over a thousand hours of my time and my firm's time. It involved felony counts and misdemeanor counts originally filed in Circuit Court which we were able to get dismissed. The State chose to appeal this dismissal to the First District Court of Appeal which upheld the trial judge's granting of our motions to dismiss. This involved the interpretation of a statute governing the submission of travel vouchers which had been on the books since 1963 and resulted in the making of new law in this area. After the First District Court of Appeal made its ruling, the State then moved for rehearing of the Court of Appeals' ruling and further asked that the case be certified to the Supreme Court of Florida. The First District Court of Appeal refused the grant either of these motions. The case was refiled as misdemeanors by the State Attorney in Leon County and was tried by a jury which found Mr. Maloy not guilty on all counts.

Our office expended considerable time in taking depositions of the State's witnesses, and others. Additionally, our office had to review countless documents and a large amount of tape recordings of statements taken by FDLE investigators. The State continued to take follow-up tape recorded statements of various witnesses as the case progressed.

In addition, because of the voluminous documents, numerous interviews of various witnesses, and numerous tape recorded statements of witnesses by FDLE, it was necessary to meet with Mr. Maloy on a constant basis in order to discuss and analyze these various items.

The handling of these various cases and associated matters required experienced attorneys with a high degree of skill and proficiency to represent Mr. Maloy in the best manner possible.

- (2) the likelihood that the acceptance of the particular employment will preclude other employment by the lawyer;**

Because we agreed to represent Mr. Maloy and provide him with the best legal representation possible, my office expended over 1000 hours which precluded the representation of other clients.

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- (3) the fee, or rate of fee, customarily charged in the locality for legal services of a comparable or similar nature;

The hourly rate charged is commensurate with the rate charged by other first tier firms in the Leon County area. Additionally, the hourly fees charged in this case are fees that our firm has been charging clients for several years.

- (4) the significance of, or amount involved in, the subject matter of the representation, the responsibility involved in the representation, and the results obtained;

The subject matter of representation involved defense of a high profile political prosecution which could have resulted in the permanent loss of Mr. Maloy's commission seat, the loss of his salary, as well as the loss of his pension, in addition to potential incarceration. It involved negotiations with the Governor's office, other public officials, as well as dealing with the State Attorney's Office. The results of our representation speak for themselves.

- (5) the time limitations imposed by the client or by the circumstances and, as between attorney and client, any additional or special time demands or requests of the attorney by the client;

Mr. Maloy insisted upon the highest degree of representation possible. To Mr. Maloy it was a matter of the highest importance. He was insistent at all times that my staff and me devote all time necessary in order to vindicate him in this matter. He was insistent at all times that he had never intentionally violated any law or his oath of office and it was of the utmost importance to him that he be exonerated.

- (6) the nature and length of the professional relationship with the client;

Our professional relationship with Mr. Maloy commenced in April 2001, prior to any charges being filed against him, and continued through a period of time until he was acquitted by the jury in December of 2002. During that time we stood by him when he was charged, when he was suspended by the Governor, when the charges were dismissed, when the State appealed, and when he was ultimately exonerated. It is important to note that the State Attorney's Office in this case took a very hard line position which precluded the possibility of settlement without the permanent loss of Mr. Maloy's elected office, and the possible loss of financial benefits.

Mr. Herbert W.A. Thiele
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- (7) the experience, reputation, diligence, and ability of the lawyer or lawyers performing the service and the skill, expertise, or efficiency of effort reflected in the actual providing of such services; and

I and the lawyers who work with me have a combined experience of over 50 years practicing law. Our firm is rated by Martindale-Hubbell as an AV firm. We specialize in criminal defense matters and have frequently represented public officials as well as other professionals being investigated for or charged with white collar crimes. Our firm prides itself on the top quality representation of our clients in the most efficient manner possible to achieve maximum results.

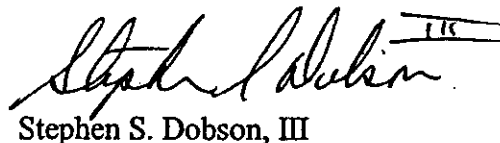
- (8) whether the fee is fixed or contingent, and, if fixed as to amount or rate, then whether the client's ability to pay rested to any significant degree on the outcome of the representation.

It was always understood that the payment of our fees in full rested in large part on the success of the litigation. Mr. Maloy understood that if he was exonerated in this matter that Leon County would reimburse him for his legal fees and costs. Mr. Maloy had conversations with various County officials who informed him that this was in fact the position and policy of Leon County.

I would like to point out that we took great care not to include in our bill to Leon County a number of other costs and fees incurred in our representation of Mr. Maloy. These include our representation at various meetings and interviews with the Department of Transportation personnel which took place over the course of a number of days as well as other related fees and costs. Additionally, we have not billed for a large amount of telephone conferences nor have we billed for many other costs our firm incurred as a result of Mr. Maloy's representation, such as copying and printing, telephone, facsimile, mileage, postage, computer related research, and courier fees.

I am hopeful that you will see fit to resolve this matter professionally and expeditiously. According to the mandate set out in policy number 93-50, it is clear that the responsibility rests with you. I am hopeful that this will not become unduly politicized and can be resolved in accordance with your aforementioned guidelines for payment of attorney fees and costs. Please call me if you have any questions.

Sincerely,



Stephen S. Dobson, III

SSD/mtl
Enclosure

Rudolph Maloy, Commissioner
Leon County Board of County Commissioners
301 South Monroe Street
Tallahassee, Florida 32301

December 20, 2002

VIA HAND DELIVERY

Herbert W. A. Thiele, Esq.
County Attorney
Board of County Commissioners
301 South Monroe Street
Tallahassee, Florida 32301

Re: Reimbursement of Attorney's Fees

Dear Mr. Thiele:

Pursuant to Policy No. 93-50, adopted by the Leon County Board of County Commissioners on November 23, 1993, I hereby submit to you the billing statement I have received from Stephen S. Dobson, III, P.A., arising out of the successful defense of felony and misdemeanor charges brought against me by the State Attorney, William N. Meggs. A copy of the billing statement dated December 20, 2002, from Stephen S. Dobson, III, P.A., is enclosed herewith.

As you no doubt know, the charges were originally filed in Circuit Court in an eight count Information alleging three felonies and five misdemeanors. This was denominated Case No.: R-2001-2042-AF in Felony Division C of the Leon County Circuit Court. Based on the filing of these charges Governor Bush suspended me from the Leon County Commission on May 31, 2001.

My attorneys were able to obtain dismissal of one of the felony counts by virtue of a motion to dismiss filed pursuant to Rule 3.190(c)(4), Florida Rules of Criminal Procedure. Of the remaining seven counts my attorneys were able to obtain dismissal under Rule 3.190(b), Florida Rules of Criminal Procedure, of six of them. This was based on Judge Bateman's ruling dated March 20, 2002, that Section 112.061(10), Florida Statutes, provided an exclusive remedy limited to second degree misdemeanor charges for the alleged submission of false travel vouchers. That left one count, consisting of allegations of petit theft.

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The State Attorney appealed Judge Bateman's ruling to the First District Court of Appeal, which upheld Judge Bateman's ruling. This appellate action was identified as Case No.: 1D02-1200. The First District Court of Appeal issued its Mandate on September 3, 2002, and affirmed Judge Bateman's order. This required my attorneys to research and brief the various issues and in addition present an oral argument before the First District Court of Appeal. After the First District Court of Appeal's decision the State then filed another motion before the appellate court asking that the matter be reconsidered and in addition that it be certified to the Florida Supreme Court. This again required additional legal research and briefing by my attorneys to respond to this issue as well. The First District Court of Appeal did not grant rehearing or certify this case to the Supreme Court.

After the Mandate was issued, the State Attorney chose to file an Amended Information in County Court on September 17, 2002, alleging four misdemeanors consisting of three alleged violations of 112.061(10), Florida Statutes, and the surviving alleged petit theft set out in 812.014(2)(e), Florida Statutes. This was denominated Case No.: 2002-9373, Misdemeanor Division. These four alleged misdemeanor violations were tried to a jury on December 4 and 5, 2002, with the jury finding me not guilty on all counts. On December 11, 2002, Governor Bush reinstated me to the Leon County Commission.

Thus, it may be said that after defense of two criminal actions, and the defense of an appeal to the First District Court of Appeal, my attorneys did "successfully defend or prevail" in the disposition of the various charges brought against me. Therefore, I respectfully ask for payment of all my attorney's fees and costs as contemplated in Policy No. 93-50, Leon County Board of County Commissioners.

I will now go down the list of the required information set out in Section 4 of Policy No.: 93-50 identified as a. through j.

- a. **The name and current address of the person making the request.** Rudolph Maloy, 2324 Napoleon Bonaparte Drive, Tallahassee, Florida 32308.
- b. **A description of the entity conducting the investigation or proceeding, if known.** The investigation was conducted by the Florida Department of Transportation and by the Florida Department of Law Enforcement.
- c. **The case number or file number of the investigation or proceeding, if known.** The original Information filed in Circuit Court was identified as Case No.: R-2001-2042-AF. The appeal in the First District Court of Appeal was identified as Case No.: 1D02-1200. After the appellate case was decided four of the charges were re-filed in Leon County Court and denominated Case No.: 2002-9373.

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- d. **A description of each count, charge and/or allegation made or being investigated.**

Original Action in Circuit Court.

Count I - Grand Theft pursuant to Section 812.014(2)(c), Florida Statutes, occurring between May 3, 1999, and July 1, 1999.

Count II - Grand Theft pursuant to Section 812.014(2)(c), Florida Statutes, occurring between March 1, 2000, and April 5, 2000.

Count III - Official Misconduct pursuant to Section 839.25, Florida Statutes, occurring between November 23, 1998, and March 9, 2000.

Count IV - Petit Theft pursuant to Section 812.014(3)(a), Florida Statutes, occurring between November 23, 1998, and December 17, 1998.

Count V - Petit Theft pursuant to Section 812.014(3)(a), Florida Statutes, occurring between November 23, 1998, and December 17, 1998.

Count VI - Petit Theft pursuant to Section 812.014(3)(a), Florida Statutes, occurring between February 11, 1999, and February 16, 1999.

Count VII - Petit Theft pursuant to Section 812.014(3)(a), Florida Statutes, occurring between June 22, 1999, and July 2, 1999.

Count VIII - Petit Theft pursuant to Section 812.014(3)(a), Florida Statutes, occurring between June 22, 1999, and August 20, 1999.

Misdemeanor Action in County Court subsequent to Appeal.

Count I - Submission of False Travel Voucher pursuant to Section 112.061(10), Florida Statutes, occurring December 15, 1998.

Count II - Submission of False Travel Voucher pursuant to Section 112.061(10), Florida Statutes, occurring February 16, 1999.

Count III - Submission of False Travel Voucher pursuant to Section 112.061(10), Florida Statutes, occurring June 29, 1999.

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Count IV - Petit Theft pursuant to Section 812.014(2)(e), Florida Statutes, occurring August 20, 1999.

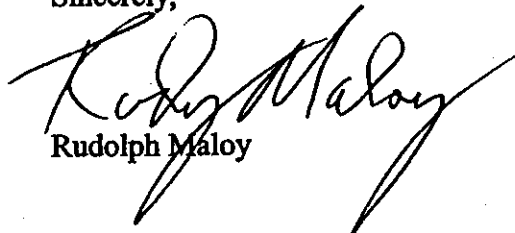
- e. **The date(s) that the alleged wrongful incidents are alleged to have occurred.** Please see information set out in paragraph d.
- f. **The person's office or position of employment with the county on the dates described in (e.) above.** County Commissioner.
- g. **A narration of the reasons why such person believes that the request meets the criteria set forth in this policy and that his or her attorney's fees and costs should be reimbursed by the county.** All of the charges involved in this matter were initiated after a request by the Leon County Commission asking that certain allegations involving me be investigated by the Florida Department of Law Enforcement. I know that one Leon County Commissioner specifically requested that all of my travel be investigated by the Florida Department of Law Enforcement even though this is not what the Governor's directive to the Florida Department of Law Enforcement tasked them to do. I believe my attorney's fees should be paid by the Leon County Commission because my attorneys successfully defended all charges by obtaining either dismissal of some charges and a jury verdict of acquittal on the remaining charges. Included in this defense was the successful opposition to the State's appeal to the First District Court of Appeal which resulted in that Court upholding Judge Bateman's ruling. This resulted in Governor Bush reinstating me to the Leon County Board of County Commissioners.
- h. **The name(s), address, and telephone number of the attorney(s) representing such person against the counts, charges and/or allegations described in (d.) above.** Stephen S. Dobson, III, Gary M. Ketchum, Richard H. Smith, Millicent T. Lundgren (paralegal), Jodi Warmack (paralegal), 610 North Duval Street, Tallahassee, Florida 32301, (850) 224-2683.
- i. **A description of the fee arrangement or agreement between the person and his or her attorney(s); the amount of attorney's fees and costs paid to the date of the written request for attorney's fees and costs for defense against the counts, charges, and/or allegations described in (d.) above; and the total balance due, if any, of all attorney's fees and costs that have been incurred in defense against the counts, charges, and/or allegations described in (d.) above.** I agreed to pay Stephen S. Dobson, III, P.A., for their representation in this matter and further agreed to pay them their normal and regular hourly rates.

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These were to pay Stephen S. Dobson, III, and Gary M. Ketchum \$300.00 per hour, Richard H. Smith \$225.00 per hour, and \$75.00 per hour for paralegal fees. In addition, I agreed to pay all the attendant costs associated with litigation.

- j. **Such other information as the Board of County Commissioners and/or the County Attorney's office may reasonably require. Please let me know if you need any further information.**

Sincerely,



Rudolph Maloy

RM:jlw

Enclosure(s)

Stephen S. Dobson, III, P.A.
610 North Duval Street
Tallahassee, Florida 32301

Invoice submitted to:
Mr. Rudolph Maloy
2324 Napoleon Bonaparte Drive
Tallahassee FL 32308

December 20, 2002

Invoice #10016

Professional Services

		<u>Hours</u>	<u>Amount</u>
4/18/2001	SSD Conference, re: FDLE investigation and allegations involved in said investigation.	2.00	600.00
4/19/2001	RHS Conference w/ Steve Dobson and paralegal, re: Maloy issues.	1.00	225.00
	MTL Conference w/ Steve Dobson and Richard Smith, re: Maloy issues.	1.00	75.00
	SSD Conference w/ paralegal and RHS, re: Maloy issues.	1.00	300.00
4/24/2001	SSD Conference w/ Rudy Maloy.	2.00	600.00
5/11/2001	SSD Conference w/ Rudy Maloy.	2.30	690.00
5/29/2001	SSD Various telephone conferences, re: FDLE investigation; Conference w/ Rudy Maloy.	1.60	480.00
5/30/2001	RHS Conference w/ Steve Dobson, re: conditions of release; Telephone conference with Leon County Sheriff's Office; Telephone conference with Leon County Clerk's Office.	1.50	337.50
	SSD Telephone conference with paralegal, re: FDLE seeking arrest warrant for Maloy; Various telephone conferences with FDLE, re: obtaining warrant, attempting to allow Maloy to turn himself in the next day, etc.; Conference w/ Rudy Maloy; Conferences w/ various staff and others to turn Maloy in at the Leon County Jail; Telephone conference with Sheriff's office, re: turning Maloy in at jail; Conference w/ Maloy.	4.50	1,350.00

Mr. Rudolph Maloy

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		<u>Hours</u>	<u>Amount</u>
5/30/2001	MTL Telephone conference with Steve Dobson, re: FDLE seeking arrest warrant for Rudy Maloy.	0.30	22.50
5/31/2001	SSD Prepare and enter Notice of Appearance, Plea of Not Guilty, and Notice of Discovery; Conference w/ paralegal; Conference w/ Rudy Maloy; Various telephone conferences; Review Executive Order of Governor suspending Maloy.	3.50	1,050.00
	MTL Conference w/ S. Dobson, re: Notice of Appearance, etc.; Prepare Notice of Appearance, Plea of Not Guilty, and Notice of Discovery and file w/ Clerk of Court.	0.50	37.50
6/4/2001	SSD Review notes of arraignment from Clerk's office; Conference w/ Rudy Maloy.	1.30	390.00
	SSD Telephone conference with Craig Dennis; Attempts to reach Rudy Maloy; Telephone conference with Craig Dennis; Telephone conference with Dennis and Remillard; Telephone conference with Rudy Maloy; Conference w/ Rudy Maloy; Telephone conference with Craig Dennis; Conference w/ Maloy and Craig Dennis; Conference w/ Rudy Maloy.	3.40	1,020.00
6/6/2001	SSD Conference w/ Rudy Maloy.	2.00	600.00
6/12/2001	SSD Preliminary research; Conference w/ Maloy.	5.00	1,500.00
6/18/2001	SSD Telephone conference with Rudy Maloy; Conference w/ Maloy, Bateman, Knowles & Herron at Knowles' office.	2.30	690.00
6/19/2001	SSD Preliminary research.	2.00	600.00
6/20/2001	SSD Conference w/ Maloy; Conference w/ Richard Smith, re: discovery materials.	2.50	750.00
6/21/2001	SSD Telephone conference with State Attorney's Office, re: discovery materials.	0.30	90.00
7/5/2001	SSD Telephone conference with State Attorney's Office, re: asking for all discovery items.	0.30	90.00
7/9/2001	SSD Review notice of case management from clerk's office; Conference w/ Maloy; Conference w/ Richard Smith and Maloy.	2.30	690.00
	RHS Conference w/ Steve Dobson and Rudy Maloy.	1.00	225.00
7/24/2001	MTL Telephone conference with Maloy, re: Ed Depuy appointed by Governor, FDLE served subpoena on Tourist Development Council, status of discovery.	0.30	22.50
7/25/2001	SSD Conference w/ Maloy; Letter to ASA Lammers, re: asking again for all discovery materials.	1.30	390.00

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		<u>Hours</u>	<u>Amount</u>
7/27/2001	SSD Conference w/ Maloy.	1.00	300.00
7/31/2001	SSD Receive and review answer to demand for discovery from State Attorney's Office; Conference w/ Rudy Maloy.	2.00	600.00
8/1/2001	SSD Review discovery materials.	2.50	750.00
8/6/2001	SSD Review discovery materials.	2.50	750.00
8/7/2001	RHS Review all discovery provided; Conference w/ Steve Dobson.	7.00	1,575.00
	SSD Review discovery materials; Conference w/ Richard Smith.	3.50	1,050.00
8/8/2001	RHS Conference w/ Steve Dobson and Rudy Maloy.	1.00	225.00
	SSD Review discovery materials; Conference w/ Maloy.	3.50	1,050.00
8/14/2001	SSD Conference w/ client, re: election law issues.	1.00	300.00
8/22/2001	SSD Review notice of case management from clerk's office; Conference w/ Maloy; Review discovery materials.	2.40	720.00
8/23/2001	SSD Conference w/ paralegal, re: sorting, organizing discovery.	0.30	90.00
	MTL Conference w/ S. Dobson, re: organization of discovery materials.	0.30	22.50
8/26/2001	RHS Review for retirement issues.	2.50	562.50
8/27/2001	SSD Review case law, re: forfeiture of retirement benefits.	1.00	300.00
9/18/2001	SSD Conference w/ Maloy; Review documents.	2.50	750.00
11/7/2001	SSD Review notice of case management/pretrial from clerk's office.	0.30	90.00
11/8/2001	SSD Conference w/ Rudy Maloy and Richard Smith.	2.00	600.00
	RHS Conference w/ Steve Dobson and Rudy Maloy.	2.00	450.00
11/9/2001	GMK Conference w/ Steve Dobson, re: forfeiture of retirement, review of case law and statutory law.	2.00	600.00
	SSD Conference w/ Gary Ketchum; Review case law and statutory law, re: forfeiture of retirement, effect of conviction, as well as statutory law; Conference w/ Rudy Maloy.	3.50	1,050.00
11/13/2001	MTL Conference w/ S. Dobson, re: witnesses, travel records, etc.	0.50	37.50
	SSD Review documents; Review case law; Conference w/ paralegal; Conference w/ Rudy Maloy.	3.50	1,050.00

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		<u>Hours</u>	<u>Amount</u>
11/14/2001	SSD Various telephone conferences w/ ASA Lammers.	0.50	150.00
11/15/2001	SSD Draft letter to ASA Lammers; Telephone conference with ASA Lammers; Conference w/ Rudy Maloy.	1.80	540.00
	SSD Draft letter to ASA Lammers; Telephone conferences with ASA Lammers; Conference w/ Rudy Maloy.	1.80	540.00
11/29/2001	RHS Conference w/ Steve Dobson, Rudy Maloy and Gary Ketchum.	1.50	337.50
	SSD Conference w/ Rudy Maloy, Gary Ketchum and Richard Smith.	1.50	450.00
	GMK Conference w/ Steve Dobson, Rudy Maloy, and Richard Smith.	1.50	450.00
12/10/2001	SSD Review notice of case management from clerk's office.	0.30	90.00
12/20/2001	GMK Conference w/ Steve Dobson and Leon County Finance Director.	1.00	300.00
	SSD Conference w/ Rudy Maloy; Conference w/ Leon County Finance Director and Gary Ketchum.	2.00	600.00
12/21/2001	SSD Conference w/ Gary Ketchum and Parwez Alam.	1.00	300.00
	GMK Conference w/ Steve Dobson and Parwez Alam.	1.00	300.00
1/14/2002	SSD Review notice of case management from Clerk's office; Conference w/ consultant; Conference at FDLE w/ ASA Lammers and FDLE agents; Conference w/ Rudy Maloy; Telephone conference with ASA Lammers.	4.00	1,200.00
	GMK Conference w/ client, Steve Dobson and consultant/expert.	1.20	360.00
1/19/2002	SSD Conference w/ Gary Ketchum, Rudy Maloy, Richard Smith and others.	4.50	1,350.00
	GMK Conference w/ client, Steve Dobson, Richard Smith and others.	4.50	1,350.00
	RHS Conference w/ Steve Dobson, Gary Ketchum, client and others.	4.50	1,012.50
1/21/2002	SSD Various telephone conferences w/ ASA Lammers.	0.50	150.00
1/22/2002	SSD Conference w/ Gary Ketchum, Rudy Maloy, and Doris Maloy.	2.50	750.00
	GMK Conference w/ Dobson, Rudy Maloy and Doris Maloy.	2.50	750.00
1/24/2002	GMK Conference w/ Dobson, re: trial issues; Fax to Dobson, re: retirement forfeiture, etc.	1.00	300.00
	SSD Conference w/ Rudy Maloy; Attend case management hearing before Judge Bateman; Confer w/ Gary Ketchum, re: trial issues; Review documents and fax from Ketchum.	3.00	900.00

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		<u>Hours</u>	<u>Amount</u>
1/25/2002	MTL Telephone conference with State Attorney's Offices, re: request for copies of FDLE tapes of various interviews; and, names/addresses of State witnesses.	0.30	22.50
	SSD Draft and send notice of taking depositions to Lammers, re: John Stephens, Mike O'Connell, Kelly Kimsey, Ophelia Morris, FDOT, FDOT Credit Union, Florida Association of Counties, U.S. Air, Leon County Clerk of Court, American Express.	0.50	150.00
1/28/2002	SSD Draft and send Amended Notice of Taking Depositions to ASA Lammers; Fax to ASA Lammers; Letter to ASA Lammers, re: requesting FDLE tapes of various interviews.	0.80	240.00
1/30/2002	SSD Conference w/ Gary Ketchum.	0.50	150.00
	GMK Review Ophelia Morris' statement; Confer w/ Dobson, re: Morris deposition.	1.00	300.00
2/5/2002	GMK Conference w/ Dobson, re: status; plans for trial.	0.30	90.00
	SSD Conference w/ Gary Ketchum; Conference w/ Rudy Maloy.	1.30	390.00
2/6/2002	SSD Conference w/ Gary Ketchum, re: various files.	1.00	300.00
	GMK Discuss file organization w/ Dobson; Organize files.	4.00	1,200.00
2/7/2002	GMK Review records, materials, etc.; Prepare master sheet of documents.	6.00	1,800.00
2/8/2002	GMK Preparation of master sheet of travel; Conference w/ paralegal.	2.50	750.00
	MTL Conference w/ Gary Ketchum, re: master sheet of travel log.	0.50	37.50
	SSD Review discovery, documents, etc..	2.00	600.00
2/12/2002	SSD Conference w/ Rudy Maloy; Conference w/ Gary Ketchum; Review records w/ client.	3.00	900.00
	GMK Review records with client; Conference w/ Dobson.	2.50	750.00
2/14/2002	SSD Conference w/ Rudy Maloy; Conference w/ Gary Ketchum; Review various records.	2.80	840.00
	RHS Conference w/ Rudy Maloy.	1.50	337.50
	GMK Review travel records; Organize trial exhibits.	2.50	750.00
2/15/2002	GMK Review travel records with client; Conference w/ Dobson; Research statute of limitations.	2.60	780.00

Mr. Rudolph Maloy

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		<u>Hours</u>	<u>Amount</u>
2/15/2002	SSD Conference w/ Rudy Maloy; Review various records; Legal Research; Conference w/ Gary Ketchum; Telephone conference with State Attorney's Office, re: requesting tapes of interviews; Conference w/ Ketchum and Smith.	3.30	990.00
	GMK Review travel records with client; Conference w/ Dobson and Smith, re: statute of limitations.	3.00	900.00
2/17/2002	GMK Review file for list of witnesses.	2.50	750.00
2/18/2002	GMK Prepare witness list w/ client.	3.00	900.00
2/19/2002	SSD Conference w/ Maloy; Review various records, documents, etc.; Conference w/ Maloy and Ketchum, re: discuss witnesses, witness list, etc.	4.50	1,350.00
	GMK Prepare witness list; Conference w/ Dobson and Maloy, re: discuss witnesses, witness list, etc.	4.00	1,200.00
2/20/2002	GMK Review counts; Prepare deposition notice.	3.20	960.00
	SSD Conference w/ Maloy; Review records, documents, etc.; Edit and finalize Defendant's Witness List; Trial preparation.	4.20	1,260.00
2/21/2002	GMK Review evidence; Conference w/ Dobson, Smith and client.	3.00	900.00
	RHS Conference w/ Dobson, Ketchum and Maloy, re: trial preparation.	3.00	675.00
	SSD Trial preparation; Conference w/ Maloy, Ketchum and Richard Smith; Prepare and file Amended Notice of Taking Depositions; Letter to ASA Lammers again requesting FDLE audiotapes of interviews; Letter to ASA Lammers requesting names and addresses of custodian of records.	6.10	1,830.00
2/22/2002	SSD Trial preparation; Conference w/ Maloy.	3.00	900.00
2/23/2002	SSD Review documents, records, etc.; Conference w/ Rudy Maloy.	4.00	1,200.00
2/24/2002	GMK Conference w/ Dobson and Maloy; Review travel vouchers.	1.00	300.00
	SSD Conference w/ Gary Ketchum and Rudy Maloy; Conference w/ Maloy; Review records, documents, etc.; Review travel voucher audit information.	4.00	1,200.00
2/25/2002	GMK Legal research, re: Chapter 112.	4.50	1,350.00
	SSD Conference w/ Maloy; Review records, documents, etc.	3.50	1,050.00
2/26/2002	GMK Conference w/ Dobson and Maloy.	1.50	450.00
	SSD Conference w/ Gary Ketchum and Rudy Maloy.	1.50	450.00

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		<u>Hours</u>	<u>Amount</u>
2/27/2002	GMK Legal research, re: limitations period; Conference w/ Dobson and Maloy.	3.50	1,050.00
	SSD Review legal research; Conference w/ Rudy Maloy; Trial preparation; Conference w/ Gary Ketchum and Rudy Maloy.	4.00	1,200.00
2/28/2002	SSD Conference w/ Gary Ketchum and Richard Smith; Review case law; Review motions to dismiss; Conferences w/ Rudy Maloy.	4.00	1,200.00
	RHS Conference w/ Dobson and Ketchum, re: motion to dismiss.	2.00	450.00
	GMK Conference w/ Dobson and Smith; Review and revise Motions to Dismiss.	3.00	900.00
3/1/2002	SSD Conference w/ Rudy Maloy; Draft and file Amended Notice of Taking Depositions; Conference w/ Gary Ketchum; Review case law and statutory law; Letter to ASA Lammers, re: Ophelia Morris; Letter to Clerk of Court, re: working papers and 119.07 request.	4.60	1,380.00
	GMK Conference w/ Dobson.	1.00	300.00
3/2/2002	SSD Conference w/ Gary Ketchum and Richard Smith; Conference w/ Rudy Maloy; Review case law and statutory law; Discuss, review and revise motions to dismiss; Trial preparation.	10.00	3,000.00
	GMK Conference w/ Dobson and Smith.	1.50	450.00
	RHS Conference w/ Ketchum and Dobson; Review and make changes to motions to dismiss.	5.00	1,125.00
3/3/2002	GMK Review and revise Motions to Dismiss; Legal research.	3.50	1,050.00
	GMK Conference w/ Dobson	1.50	450.00
	SSD Review, revise and edit motions to dismiss; Conference w/ Gary Ketchum; Conferences w/ Rudy Maloy; Trial preparation and prepare for depositions.	8.00	2,400.00
3/4/2002	GMK Conference w/ Dobson; Prepare for depositions.	8.00	2,400.00
	RHS Review final draft of motion to dismiss.	2.50	562.50
	GMK Finalize and file Motions to Dismiss; Legal Research.	5.00	1,500.00
	SSD Finalize Rule 3.190(b) Motion to Dismiss; Conference w/ Gary Ketchum; Conference w/ Rudy Maloy; Meeting w/ ASA Lammers and Judge Bateman; Conference w/ Rudy Maloy.	6.00	1,800.00
3/5/2002	SSD Attend depositions of various witnesses; Conference w/ Rudy Maloy; Conference w/ paralegal; Review records, documents, etc.	8.00	2,400.00

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		<u>Hours</u>	<u>Amount</u>
3/5/2002	GMK Prepare for Ophelia Morris' deposition; Prepare for and attend Kelly Kimsey deposition.	4.00	1,200.00
	MTL Conference w/ S. Dobson, re: records.	0.50	37.50
3/6/2002	SSD Conference w/ Leon County Finance Director and review affidavit of Bogan; Conference w/ Lillian Bennett and review affidavit of Ms. Bennett; Edit and finalize Rule 3.190(c) Motion to Dismiss; Review documents; Conference w/ Maloy; Conference w/ ASA Lammers and Judge Bateman; Conference w/ ASA Lammers.	5.00	1,500.00
	GMK Draft C-4 Motion and supporting affidavits.	4.00	1,200.00
3/7/2002	GMK Review and revise proposed orders on Motions to Dismiss.	5.00	1,500.00
	SSD Telephone conferences with State Attorney's Office; Review and edit draft of proposed orders; Prepare and file notice of cancellation of depositions; Conference w/ Rudy Maloy.	2.60	780.00
3/8/2002	SSD Conference w/ Maloy; Prepare for deposition; Attend deposition of FDLE Lober.	5.20	1,560.00
	GMK Prepare for Lober deposition.	4.00	1,200.00
3/9/2002	SSD Review documents, records, etc. to prepare for depositions and trial; Conference w/ Rudy Maloy.	7.00	2,100.00
3/10/2002	SSD Review records, documents, etc. in preparation for depositions and trial.	6.00	1,800.00
3/11/2002	SSD Prepare for and attend deposition of FDLE Agent O'Connell; Conference w/ ASA Lammers; Review documents, records, etc.; Conference w/ Rudy Maloy.	6.30	1,890.00
	GMK Prepare for and attend O'Connell deposition.	3.00	900.00
3/12/2002	SSD Telephone conference with ASA Lammers, informed Mr. Meggs is relieving him of all duties and responsibilities on Maloy case - - Neill Wade to take over as prosecutor; Receive and review Order from Judge Bateman dismissing Count II of the Information; Telephone conference with Neill Wade; Prepare and file Notice of continuation of deposition; Review documents; Conference w/ Maloy; Review and revise witness list.	3.70	1,110.00
	GMK Draft Motion to Dismiss for Selective Prosecution; Conference w/ Dobson and Maloy; Legal research.	4.00	1,200.00
	GMK Legal research, re: motion to dismiss for selective law enforcement and/or selective prosecution; Conference w/ Dobson and Maloy.	3.00	900.00
3/13/2002	SSD Review, finalize and file Amended Witness List; Telephone conferences with paralegal.	0.90	270.00

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		<u>Hours</u>	<u>Amount</u>
3/13/2002	MTL Telephone conferences with S. Dobson.	0.40	30.00
3/14/2002	GMK Prepare Roosevelt Holloman affidavit; Revise Motion for Selective Prosecution; Conference w/ Dobson and Maloy, re: deposition schedule.	6.00	1,800.00
	SSD Fax to Leon County Clerk's office; Prepare letter to FDLE McLaughlin (hand delivery); Correspondence back and forth with Judge Bateman and Neill Wade; Telephone conferences with Neill Wade; Telephone conference with State Attorney's Office, re: requested tapes; Receive 35 audio cassette tapes of various witness interviews conducted by FDLE; Conference w/ Rudy Maloy; Conference with and interview of Roosevelt Holloman; Review documents; Prepare for FDLE deposition the next day.	6.00	1,800.00
	GMK Organize documents.	2.00	600.00
3/15/2002	SSD Prepare for and attend deposition of FDLE Lober; Conference w/ Gary Ketchum and Rudy Maloy; Conference w/ Judge Bateman, Gary Ketchum and ASA Wade; Conference w/ Gary Ketchum and Rudy Maloy; Letter to County Administrator for 119.07 request; Prepare and file Defendant's Amended Witness List; Review State's Response to Def's Motion to Dismiss.	11.00	3,300.00
	GMK Prepare for and attend continuation of Lober deposition; Conference w/ Dobson and Maloy; Conference w/ Dobson, Judge Bateman and ASA Wade; Conference w/ Dobson, Maloy and Richard Smith.	7.00	2,100.00
3/16/2002	GMK Conference w/ Dobson and Maloy; Conference w/ potential witness; Prepare reply to State's Memorandum; Legal research.	6.00	1,800.00
	SSD Conference w/ Gary Ketchum; Conference w/ Ketchum and Maloy; Conference w/ potential witness; Review documents, records, etc.; Analyze state's response and possible reply.	8.00	2,400.00
3/17/2002	GMK Finalize reply to State's response; Legal research.	4.50	1,350.00
	RHS Review and edit reply to State's Response to Motion to Dismiss.	3.00	675.00
	SSD Review documents, etc.; Prepare for hearing next day; Review and edit Defendant's Reply to State's Response; Conference w/ Rudy Maloy.	10.00	3,000.00
3/18/2002	GMK Prepare Mallory Home affidavit; Conference w/ Dobson; Prepare for and attend court hearing on Defendant's Motion to Dismiss.	5.00	1,500.00
	SSD Telephone conference with Mallory Home; Conference w/ Gary Ketchum; Edit affidavit for Mallory Home per Mr. Home's instructions; Prepare for hearing; Attend hearing on Defendant's Motion to Dismiss before Judge Bateman; Conference w/ Rudy Maloy; Review case law; Review documents.	9.00	2,700.00
3/19/2002	SSD Telephone conference with Judge Bateman and ASA Wade; Waiting on Judge's order at Judge's instruction; Interview potential witnesses; Telephone conferences with Neill Wade; Telephone conference with	11.00	3,300.00

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		<u>Hours</u>	<u>Amount</u>
	Judge Bateman and ASA Wade; Waiting on Judge Bateman's order at Judge's request (and various discussions with ASA Wade throughout the evening); Receive and review Judge's "draft" Order (after 10:00 p.m.); Telephone conference with ASA Wade and Judge Bateman; Telephone conference with ASA Wade.		
3/19/2002	GMK Wait on Judge Bateman's order at Judge's instruction; Conference w/ Dobson; Review documents; Review Judge Bateman's "draft" Order; Conference w/ Dobson and Maloy.	10.00	3,000.00
3/20/2002	SSD Early morning meeting with Judge Bateman, ASA Wade, and Gary Ketchum; Prepare for depositions; Attend depositions of witnesses; Conference w/ Ketchum and Maloy; Telephone conference with ASA Wade.	6.50	1,950.00
	GMK Early morning conference w/ Judge Bateman, Dobson and ASA Wade; Prepare for depositions; Attend depositions of Doughty and McLaughlin; Conference w/ Dobson and Maloy, re: strategy	5.00	1,500.00
3/21/2002	GMK Attend pretrial hearing; Legal research, re: Florida constitution regarding suspension; Telephone conference with client and Maloy.	2.50	750.00
	SSD Review legal research; Conference w/ Rudy Maloy; Attend pretrial hearing (state requests stay of proceedings, defense wants trial now).	4.00	1,200.00
3/22/2002	SSD Conference w/ Gary Ketchum; Edit and revise letter to Governor; Conference w/ Maloy; Conference w/ Ketchum; Conference w/ Maloy.	3.50	1,050.00
	GMK Draft letter to Governor Bush; Conference w/ Dobson.	2.00	600.00
3/24/2002	GMK Review appeal pleadings from State.	1.00	300.00
3/25/2002	SSD Review Judge's Order directing court reporter to transcribe hearing; Attempts to reach ASA Wade; Review State's Motion to Stay Further Proceedings and Toll Speedy Trial; Conference w/ Rudy Maloy.	1.90	570.00
	GMK Legal research.	1.00	300.00
4/5/2002	RHS Conference w/ Maloy.	1.00	225.00
4/9/2002	GMK Telephone conference w/ Mark Walker, re: possible action against Governor.	0.30	90.00
4/10/2002	RHS Go to the clerk's office w/ Rudy Maloy and certify documents for appeal; Conference w/ Maloy.	5.00	1,125.00
	GMK Legal Research, re: mandamus action against Governor.	2.50	750.00
4/12/2002	RHS Conference w/ Maloy.	1.00	225.00

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		<u>Hours</u>	<u>Amount</u>
4/16/2002	GMK Legal research, re: motion to expedite, election statutes.	3.00	900.00
4/17/2002	RHS Conference w/ Maloy.	1.00	225.00
4/18/2002	GMK Telephone conference with Mark Walker.	0.50	150.00
4/19/2002	GMK Conference w/ Mark Walker, re: motion to expedite.	1.50	450.00
4/23/2002	SSD Review file; Listen to FDLE audio cassette tapes; Conference w/ Rudy Maloy; Conference w/ paralegal; Conference w/ Gary Ketchum.	6.50	1,950.00
	GMK Conference w/ Steve Dobson.	0.75	225.00
	MTL Conference w/ S. Dobson, re: FDLE audio cassette tapes.	0.50	37.50
4/24/2002	SSD Listen to FDLE audio cassette tapes; Conference w/ Rudy Maloy; Review documents.	4.50	1,350.00
4/25/2002	SSD Review travel records, documents, etc.; Conference w/ Maloy; Telephone conference with State Attorney's Office.	3.50	1,050.00
	GMK Conference w/ Ion Sancho, re: motion to expedite.	1.50	450.00
4/26/2002	GMK Conference w/ Dobson, re: motion to expedite.	3.00	900.00
	SSD Conference w/ Gary Ketchum; Conference w/ Rudy Maloy; Review various motions, research, etc.; Review, edit, finalize and file Motion to Consider Appeal on an Emergency Basis, Establish an Expedited Briefing Schedule and Set Oral Argument.	5.50	1,650.00
	GMK Dictate, revise and file Motion to Expedite; Conference w/ Dobson.	3.50	1,050.00
5/1/2002	GMK Review Mark Walker's Petition before the Florida Supreme Court.	0.50	150.00
	SSD Listen to FDLE tape recorded interviews of witnesses; Conference w/ Maloy.	2.50	750.00
5/2/2002	RHS Review Mark Walker's Petition and edit.	3.50	787.50
	SSD Listen to FDLE tape recorded interviews of witnesses; Conference w/ Maloy; Review documents, records, etc.	3.50	1,050.00
5/3/2002	SSD Conference w/ Maloy; Listen to FDLE tape recorded interviews of witnesses; Receive and review letter from Gregory Munson, Assistant General Counsel to the Governor.	4.50	1,350.00
5/6/2002	GMK Legal research, re: locate and copy suspension orders at State Archives.	2.00	600.00
5/7/2002	GMK Conference w/ client, re: response to Governor's letter.	1.50	450.00

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		<u>Hours</u>	<u>Amount</u>
5/8/2002	GMK Draft letter to Governor.	1.80	540.00
	SSD Review and revise proposed letter to Governor Bush responding to Greg Munson's letter of May 3, 2002.	1.00	300.00
5/9/2002	SSD Receive and review Initial Appellate Brief of the State; Conference w/ Maloy and Ketchum.	2.50	750.00
	GMK Legal research, re: locate cases cited in Governor's letter; Conference w/ Dobson and Maloy, re: brief filed by State; Review State's brief; Review cases cited in State's brief.	3.50	1,050.00
5/10/2002	SSD Analyze and breakdown State's Initial Brief; Conference w/ Rudy Maloy; Outline issues.	5.50	1,650.00
5/11/2002	RHS Review initial brief; Create outline for point by point rebuttal of issues.	6.50	1,462.50
	SSD Review and breakdown each case cited by the State; Review documents, etc.	5.00	1,500.00
5/12/2002	SSD Continue review and breakdown of State's cases; Conferences w/ Rudy Maloy; Review documents, records, etc.	6.00	1,800.00
5/13/2002	SSD Conferences w/ Ketchum, re: outline response and how to attack State's brief; Receive and review 1st DCA's Order granting expedited consideration.	2.30	690.00
	GMK Conferences w/ Dobson, re: outline response to State's brief.	2.25	675.00
5/14/2002	RHS Conference w/ Dobson and Ketchum, re: research and brief.	2.00	450.00
	GMK Conference w/ Dobson and Smith, re: research and strategy for brief.	2.00	600.00
	SSD Conference w/ Ketchum and Smith, re: review research to date and discuss brief strategy.	2.00	600.00
5/15/2002	SSD Review documents, records, etc.; Conference w/ Ketchum, re: appellate brief.	2.50	750.00
	GMK Conference w/ Dobson, re: brief.	1.00	300.00
5/16/2002	GMK Conference w/ Dobson; Draft appellate brief; Legal research.	3.50	1,050.00
	SSD Participate in preparation of appellate brief; Review case law; Review documents; Conference w/ Gary Ketchum; Conference w/ Maloy.	5.00	1,500.00
5/17/2002	SSD Review, edit, and revise appellate brief; Conference w/ Ketchum, re: additional changes; Review documents; Conference w/ Maloy.	6.50	1,950.00
	GMK Review and revise brief; Conference w/ S. Dobson.	3.50	1,050.00

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		<u>Hours</u>	<u>Amount</u>
5/17/2002	RHS Revise and edit brief.	4.00	900.00
5/18/2002	SSD Conference w/ Ketchum, re: new research; Review new research; Review statutory law and case law.	5.50	1,650.00
	GMK Legal research; Conference w/ Dobson	4.50	1,350.00
5/19/2002	GMK Review and revise brief; Conferences w/ Dobson	5.00	1,500.00
	RHS Conference w/ Dobson and Maloy.	2.50	562.50
	SSD Review and revise brief; Conferences w/ Ketchum; Conference w/ Maloy and Smith.	7.50	2,250.00
5/20/2002	GMK Conferences w/ Dobson, re: brief; Finalize brief and file w/ court; Legal research.	6.50	1,950.00
	SSD Conferences w/ Ketchum, re: finalizing brief; Review, edit and finalize brief; Conference w/ Maloy; File appellate brief with First District Court of Appeal and serve on Attorney General.	7.00	2,100.00
5/21/2002	SSD Telephone conference with Assistant Attorney General, Tom Duffy; Draft and file Appellee's Request for Oral Argument before the First District Court of Appeal	0.60	180.00
5/23/2002	SSD Receive and review First District Court of Appeal Order granting oral argument; Telephone conference with Rudy Maloy; Telephone conference with Gary Ketchum; Conference w/ Rudy Maloy.	2.00	600.00
	GMK Telephone conference with Dobson.	0.30	90.00
5/30/2002	SSD Receive and review Reply Brief of State of Florida; Telephone conference with Maloy; Telephone conference with Ketchum; Conference w/ Maloy; Receive and review State's Amended Answer to Demand for Discovery (includes five additional reports as well as one taped interview).	2.60	780.00
	GMK Telephone conference with Dobson.	0.30	90.00
5/31/2002	SSD Analyze and breakdown Reply Brief; Review case law; Review statutory law.	4.00	1,200.00
	RHS Review and analyze Reply Brief for conference w/ Dobson.	5.00	1,125.00
6/10/2002	SSD Receive and review 1st DCA Order rescheduling oral argument; Telephone conference with Maloy; Conference w/ Maloy.	1.60	480.00
6/19/2002	SSD Read and review all appellate briefs; Review case law.	2.50	750.00
6/20/2002	SSD Review case law and statutory law in preparation for oral argument;	3.00	900.00

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		<u>Hours</u>	<u>Amount</u>
6/25/2002	SSD Preparation for oral argument.	4.00	1,200.00
	GMK Review appellate briefs.	1.00	300.00
6/26/2002	GMK Conference w/ Dobson, re: preparation for oral argument.	2.00	600.00
	SSD Conference w/ Gary Ketchum; Preparation for oral argument.	6.00	1,800.00
6/27/2002	GMK Conference w/ Dobson; Prepare for and attend oral argument.	5.50	1,650.00
	SSD Conference w/ Gary Ketchum; Prepare for and attend oral argument before the First District Court of Appeal; Conference w/ Rudy Maloy.	6.50	1,950.00
7/16/2002	SSD Receive and review Opinion from 1st DCA; Conference w/ Rudy Maloy; Telephone conference with Attorney General's Office.	2.50	750.00
	GMK Review Opinion from First District Court of Appeal.	0.50	150.00
7/23/2002	SSD Conference w/ client; Telephone conference with Jack Buford.	0.80	240.00
7/26/2002	GMK Conference w/ Dobson.	1.00	300.00
	SSD Receive and review State's Motion for Clarification and Certification of 1st DCA Opinion; Conference w/ Gary Ketchum; Conference w/ Maloy.	2.50	750.00
7/27/2002	SSD Review State's motion, breakdown and strategize response for filing with 1st DCA; Review case law; Conference w/ Rudy Maloy.	6.00	1,800.00
7/29/2002	GMK Review State's Motion to Clarify and Certify; Conference w/ Dobson.	1.50	450.00
	SSD Conference w/ Ketchum.	1.00	300.00
7/31/2002	SSD Assist in drafting and finalizing Defendant's Response to State's Motion to Clarify and Certify; Conference w/ Maloy.	5.00	1,500.00
	GMK Draft and finalize Response to State's Motion to Clarify and Certify.	4.50	1,350.00
8/1/2002	SSD Conference w/ Malotn, Ketchum and Smith.	1.50	450.00
	GMK Conference w/ Maloy, Dobson and Smith.	1.50	450.00
	RHS Conference w/ Dobson, Ketchum and Maloy.	1.50	337.50
8/6/2002	GMK Conference w/ Dobson and Maloy.	0.50	150.00
	SSD Conference w/ Maloy and Gary Ketchum.	0.50	150.00
8/15/2002	SSD Receive and review Order by 1st DCA denying state's motion for clarification and certification.	0.30	90.00

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		<u>Hours</u>	<u>Amount</u>
9/2/2002	GMK Legal research.	1.00	300.00
9/4/2002	GMK Conference w/ Dobson.	1.00	300.00
	SSD Receive and review letter from 1st DCA correcting the Court to issue the attached mandate as well as the certified copy of the Court's opinion in State of Florida v. Rudolph Maloy; Conference w/ Ketchum; Conference w/ Maloy.	2.50	750.00
9/16/2002	GMK Legal research, re: statute of limitations; Review of refiled charges.	3.50	1,050.00
9/17/2002	GMK Legal research.	1.00	300.00
	SSD Telephone conference with Chief Assistant State Attorney Warren Goodwin; Receive and review State's Motion to Transfer Remaining Count filed by Chief Assistant State Attorney Goodwin; Receive and review draft of Order transferring remaining count; Receive and review new Information for four misdemeanor counts from Chief Assistant State Attorney Warren Goodwin; Telephone conference with Maloy; Breakdown of new allegations; Conference w/ Maloy.	4.00	1,200.00
9/18/2002	SSD Receive and review notice of arraignment from Clerk's office; Prepare and file Notice of Appearance, Plea of Not Guilty, Notice of Discovery; Attempts to reach ASA Wade; Review documents; Conference w/ Maloy.	2.90	870.00
9/20/2002	SSD Review Notice of Case Management from Clerk's office.	0.30	90.00
9/23/2002	SSD Review Notice of Case Management from Clerk's office (changing date previously scheduled).	0.30	90.00
9/25/2002	SSD Review Information; Review statutory law, re: statute of limitations; Various discussions, re: statute of limitations; Conference w/ Maloy.	2.20	660.00
9/30/2002	SSD Conference w/ Ketchum, re: drafting motion to dismiss based on statute of limitations.	1.00	300.00
	GMK Conference w/ Dobson, re: drafting of motion to dismiss based on statute of limitations; Review and revise previously drafted motions to dismiss for selective prosecution, for statute of limitations, and to dismiss Count IV on C-4 grounds.	3.50	1,050.00
10/2/2002	GMK Legal research, re: Section 775.15(3)(b)	1.00	300.00
	SSD Listen to recorded interviews on FDLE audio tapes.	5.00	1,500.00
10/3/2002	RHS Research on statute of limitations of counts refiled after speedy trial period expires.	8.00	1,800.00
	SSD Review draft of law and analogous cases for statute of limitations motion to dismiss; Conference w/ Ketchum; Conference w/ Maloy.	3.00	900.00

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		<u>Hours</u>	<u>Amount</u>
10/3/2002	GMK Conference w/ Dobson.	2.00	600.00
10/4/2002	SSD Conference w/ Ketchum, re: potential unconstitutionality of 775.13(3)(b).	1.00	300.00
	GMK Conference w/ Dobson.	1.00	300.00
10/5/2002	SSD Conference w/ Maloy and Ketchum, re: motions to dismiss all counts as well as 775.15(3)(b) and other related issues.	3.00	900.00
	GMK Conference w/ Dobson and Maloy, re: motions to dismiss all counts as well as 775.1(3)(b) and other issues; Review and revise motion to dismiss on limitations grounds.	6.00	1,800.00
10/6/2002	SSD Conference w/ Ketchum and Maloy, re: Motions to Dismiss based on statute of limitations as well as 775.15(3)(b) being unconstitutional.	3.00	900.00
10/7/2002	SSD Review, edit and finalize Def's Motion to Dismiss all counts because of statute of limitations; Conference w/ Maloy.	3.00	900.00
10/9/2002	SSD Review, edit and finalize Defendant's Motion to Declare Section 775.15(3)(b), Florida Statutes, Unconstitutional.	2.50	750.00
10/10/2002	SSD Receive and review State's Answer to Demand for Discovery.	0.30	90.00
10/16/2002	SSD Listen to recorded interviews of witnesses on FDLE audio cassette tapes; Review documents, records, etc.	6.50	1,950.00
10/17/2002	SSD Receive and review Notice of motion hearing from clerk's office; Receive and review Notice of Case Management from clerk's office; Receive and review State's Amended Answer to Demand for Discovery; Review documents, records, etc.	5.50	1,650.00
10/18/2002	SSD Listen to recorded interviews of witnesses on FDLE audio cassette tapes; Review documents.	6.00	1,800.00
10/21/2002	SSD Listen to recorded interviews of witnesses on FDLE audio cassette tapes; Conference w/ Rudy Maloy; Review documents, records, etc.	6.50	1,950.00
10/22/2002	SSD Listen to recorded interviews of witnesses on FDLE audio cassette tapes.	6.00	1,800.00
10/24/2002	SSD Listen to recorded interviews of witnesses on FDLE audio cassette tapes; Review records, documents, etc.	4.50	1,350.00
10/27/2002	SSD Listen to recorded interviews of witnesses on FDLE audio cassette tapes; Review records, documents, etc.	6.50	1,950.00
10/28/2002	SSD Listen to recorded interviews of witnesses on FDLE audio cassette tapes.	6.50	1,950.00
10/29/2002	SSD Conference w/ Rudy Maloy; Listen to recorded statements of witnesses on FDLE audio cassette tapes.	7.00	2,100.00

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		<u>Hours</u>	<u>Amount</u>
10/29/2002	RHS Conference w/ Dobson and Maloy.	3.00	675.00
10/30/2002	SSD Receive and review State's response to the Defendant's Motion to Declare 775.15(3)(b), Florida Statutes, Unconstitutional.	0.30	90.00
	GMK Telephone conference with Dobson; Conference w/ Dobson and Maloy.	1.00	300.00
	GMK Review and revise motion to declare 775.15(3)(b) unconstitutional; Review and revise Motion to Dismiss for Selective Prosecution; Update research into motions; Prepare for hearing.	3.00	900.00
	SSD Receive and review State's response to the Defendant's Motion to Declare 775.15(3)(b), Florida Statutes, Unconstitutional; Receive and review Response to Defendant's Motion to Dismiss; Telephone conference with Ketchum; Conference w/ Rudy Maloy and Ketchum.	2.50	750.00
10/31/2002	SSD Telephone conference with Judge Harley's judicial assistant; Review and analyze State's responses; Telephone conference with ASA Evans; Conference w/ Maloy.	2.10	630.00
11/1/2002	SSD Prepare and file Defendant's Notice of Withdrawal of Motions.	0.50	150.00
11/4/2002	GMK Conference w/ Dobson, re: motion for selective prosecution; Conference w/ Richard Smith, re: speedy trial issues.	2.00	600.00
	RHS Research and conference w/ Ketchum, re: speedy trial issues.	6.50	1,462.50
	SSD Review law and facts relevant to a motion to dismiss for selective prosecution; Conference w/ Rudy Maloy; Conference w/ Ketchum; Review documents.	5.00	1,500.00
11/6/2002	GMK Conference w/ Dobson.	0.75	225.00
	SSD Conference w/ Ketchum; Review draft of motion for selective prosecution; Conference w/ Maloy.	2.50	750.00
11/7/2002	SSD Review, edit and finalize Motion for Selective Prosecution; Conference w/ Maloy.	3.00	900.00
	RHS Review and edit motion to dismiss for selective prosecution.	2.00	450.00
	GMK Review and revise motion to dismiss for selective prosecution; Conference w/ Maloy; Review files; Finalize motion.	2.00	600.00
11/16/2002	SSD Receive and review notice of case management/pretrial from clerk's office; Conference w/ client; Review file; Review documents, etc.	3.50	1,050.00
11/19/2002	MTL Conference w/ G. Ketchum and Maloy, re: preparation of witness list for selective prosecution hearing; Preparation of witness subpoenas for selective prosecution hearing.	3.75	281.25

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		<u>Hours</u>	<u>Amount</u>
11/19/2002	SSD Meet w/ client and review proposed witness list for selective prosecution hearing and related issues; Review file.	3.50	1,050.00
	GMK Conference w/ client and paralegal, re: preparation of witness list for selective prosecution hearing.	3.00	900.00
11/21/2002	SSD Trial preparation; Receive and review Motion to Quash Subpoena for Trial (witness Cariseo); Receive and review Motion to Quash Subpoena for Trial (witness Doughty); Receive and review State's Reply to Motion to Dismiss for Selective Prosecution and Memorandum of Law.	6.50	1,950.00
11/22/2002	SSD Preparation for selective prosecution hearing; Review witnesses; Prepare and revise proposed list of questions; Various telephone conferences w/ ASA Evans; Receive and review Motion to Quash Subpoena Duces Tecum for hearing (witness Cliff Thael).	8.00	2,400.00
	GMK Preparation for hearing, re: subpoenas, questions, etc.; Conference w/ Dobson and client, re: various legal issues.	8.00	2,400.00
11/23/2002	GMK Conference w/ Dobson and client, re: hearing and trial preparation.	2.00	600.00
	SSD Conference w/ Ketchum and Maloy, re: various issues; Prepare for hearing; Review file.	8.00	2,400.00
11/24/2002	GMK Conference w/ Dobson.	1.00	300.00
	SSD Conference w/ Ketchum; Prepare for hearing on selective prosecution; Trial preparation.	10.00	3,000.00
11/25/2002	GMK Prepare for and attend hearing on selective prosecution; Prepare for trial.	8.00	2,400.00
	SSD Conference w/ Dave Lang; Conference w/ Phyllis Graham; Prepare for hearing; Attend selective prosecution hearing before Judge Shaffer; Conference w/ Anita Davis; Conference w/ Tomeka Session; Conference w/ Bill Bogan; Trial preparation.	11.00	3,300.00
11/26/2002	RHS Trial preparation; Conference w/ Dobson and Ketchum.	2.00	450.00
	GMK Prepare for trial with Dobson and Maloy; Conference w/ Smith and Ketchum.	3.00	900.00
	MTL Preparation of witness subpoenas for trial.	0.50	37.50
	SSD Trial preparation; Conference w/ Maloy; Attend Maloy pretrial before Judge Harley; Receive and review returns of service of process for witnesses (Proctor, Lewis, Depuy, Summerlin, Sauls, Records Custodian, Stott, Session, Lawson, Bogan, Meggs, Winchester, Yordon, Davis, Block, Lang, Rackliff, Sirianni, Ausman, Holmes, O'Connell, Grippa, Thael, Graham); Conference w/ Francis Graham; Telephone conference with George Sirianni; Prepare and file Defendant's Witness List; Trial preparation; Conference w/ Ketchum and Smith.	10.00	3,000.00

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		<u>Hours</u>	<u>Amount</u>
11/27/2002	GMK Prepare for trial; Discuss jury instructions.	2.00	600.00
	RHS Conference w/ Maloy.	1.00	225.00
	SSD Trial preparation; Conferences w/ Maloy; Review documents, etc.	10.00	3,000.00
11/29/2002	SSD Trial preparation; Review documents, etc.	7.00	2,100.00
11/30/2002	SSD Trial preparation.	11.00	3,300.00
12/1/2002	SSD Trial preparation; Conference w/ Ketchum; Conference w/ Maloy; Review documents, etc.; Prepare for voir dire for jury selection.	12.00	3,600.00
	RHS Conference w/ Maloy.	1.00	225.00
	GMK Conference w/ Dobson.	1.50	450.00
12/2/2002	GMK Prepare for and attend jury selection before Judge Harley; Prepare proposed jury instructions; Conference w/ Dobson, re: various legal issues; Trial preparation.	10.00	3,000.00
	SSD Prepare for and attend jury selection before Judge Harley; Review various proposed jury instructions; Conference w/ Ketchum, re: various legal issues; Trial preparation.	12.00	3,600.00
12/3/2002	MTL Preparation for trial; Assemble exhibits and trial notebook; Assist w/ proposed jury instructions and opening statement.	14.00	1,050.00
	GMK Trial preparation; Finalize and submit proposed jury instructions; Assist in preparation of Opening Statement.	12.00	3,600.00
	SSD Trial preparation; Interview witnesses; Finalize and file Defendant's Requested Jury Instructions; Prepare opening statement.	14.00	4,200.00
	RHS Conference w/ Maloy.	1.00	225.00
12/4/2002	MTL Preparation for trial; Attend trial before Judge Harley; Conference w/ Dobson, Ketchum and Maloy; Assist w/ preparation of closing argument.	15.00	1,125.00
	GMK Preparation for trial; Attend trial before Judge Harley; Conference w/ Dobson, Maloy and paralegal; Assist w/ preparation of closing argument.	13.00	3,900.00
	SSD Prepare for and attend trial (<i>State of Florida v. Rudy Maloy</i>) before Judge Harley; Review all trial notes, witness statements, etc.; Prepare closing argument.	15.50	4,650.00
12/5/2002	MTL Preparation for trial; Attend trial before Judge Harley; Jury returns verdict of NOT GUILTY .	6.00	450.00
	SSD Prepare for and attend trial; Jury returns verdict of NOT GUILTY .	6.00	1,800.00

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		<u>Hours</u>	<u>Amount</u>
12/5/2002	GMK Prepare for and attend trial; Jury returns verdict of NOT GUILTY (on all counts)	6.00	1,800.00
12/11/2002	SSD Review, revise, and edit letter to Governor requesting reinstatement of Rudy Maloy to the Leon County Commission; Review Executive Order of Governor reinstating Rudy Maloy to the Leon County Commission; Review letter to County Commissioners from the Governor; Conference w/ Maloy and Ketchum.	2.80	840.00
	GMK Draft letter to the Governor requesting reinstatement of Rudy Maloy to the Leon County Commission; Review Executive Order of the Governor reinstating Maloy to the Leon County Commission; Review letter to the County Commissioners from the Governor; Conference w/ Maloy and Dobson.	3.80	1,140.00
For professional services rendered		1173.50	\$334,833.75
Additional Charges :			
1/14/2002	Meal.		15.47
	Jon Ausman, Expert Witness.		300.00
3/1/2002	Vause's Process Service.		40.00
3/4/2002	Vause's Process Service.		40.00
	Witness Fee: Nancy Worrell.		7.50
3/11/2002	Meal.		7.17
3/14/2002	Witness Fees: Bruce Host, Vince Long, Ed DePuy, Bob Rackleff, Tony Grippa, Cliff Thael, Amanda Lewis, Anna Doughty.		60.00
3/18/2002	Meal.		28.09
3/19/2002	Laurie Gilbert (Court Reporter), re: depositions - Michael O'Connell, Kelly Kimsey.		863.50
3/21/2002	Clerk of Court - Copies per records request to Leon County.		12.75
3/23/2002	C&N Court Reporters.		1,672.00
11/19/2002	Witness Fees: Rev. RB Holmes, Mike O'Connell, Jon Ausman, Gary Yordon, Dan Winchester, Bob Rackleff, John Stott, Dave Lang, Tomeka Sessions, Phyllis Graham, Roosevelt Holloman		82.50
11/26/2002	Clerk of Court.		74.25
	Cecil Towle Investigations (process service).		650.00

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12/2/2002 Cecil Towle Investigations (process service).

Amount

150.00

Total costs

\$4,003.23

Total amount of this bill

\$338,836.98

Balance due

\$338,836.98